

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	Case No.: 15-15969
Elaine Jones	:	
	:	
	:	
Debtor	:	Chapter 13

RESPONSE OF ELAINE JONES TO THE NOVEMBER 8, 2018 CERTIFICATE OF  
DEFAULT

1. Denied.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.
- "5." Denied.
6. Denied. Subsequent to the Stipulation, on or about May 22, 2017 Chase offered the Debtor a Trial Payment Plan stating three monthly payments beginning on July 1, 2017 through September 1, 2017 in the sum of \$572.36 per month (provided to Movant by the undersigned counsel). The Debtor paid the trial plan payments and has continued to make the trial plan payments; but a permanent modification, signed by both parties, was never entered into.
7. Admitted.
8. Admitted.
9. Denied.

/s/Brad J. Sadek, Esquire  
Brad J. Sadek, Esquire  
Sadek and Cooper  
1315 Walnut Street, #502  
The Philadelphia Building  
Philadelphia, PA 19107  
(215) 545-0008  
Attorney for Debtor

Dated: November 9, 2018